

Kaman - I think we should discuss this
letter with EPA at our meeting.

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DEL. 302 834-4536
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TWX 510-666-1629
STD CLOR DEC1

STANDARD CHLORINE OF DELAWARE, INC. NEW

GOVERNOR LEA ROAD • P.O BOX 319 • DELAWARE CITY, DELAWARE 19706

December 29, 1989

Ms. Diane Wehner
Environmental Scientist
Division of Air & Waste Management
DNREC
715 Grantham Lane
New Castle, Delaware 19720

RE: RI/FS

Dear Ms. Wehner:

In response to your request, please find enclosed a copy of a topographic map of Standard Chlorine of Delaware's (SCD) facility and the surrounding area on which I have marked the tentative location of two monitoring wells which the U.S. EPA representatives requested be placed on Air Products' property. The installation and location of these wells is, at this time, a matter of discussion only, since we have obtained neither access agreement nor location acceptability from Air Products. As I have indicated to you, once we have reached agreement with DNREC and U.S. EPA on the location of these wells, we will then proceed to negotiate with Air Products.

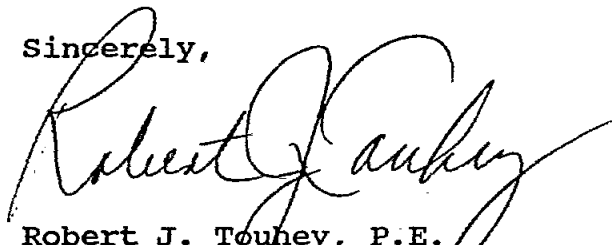
On behalf of the company, I would also like to go on record as stating that the request made by U.S. EPA was made some two and one-half months after the work plan for the remedial investigation was approved, one month after the field activities had begun and some two weeks after the drilling contract was sent out for bids. Such actions are counter-productive and make managing a project to adhere to a schedule next to impossible. In addition, the heavy-handed manner by which EPA communicates that SCD should do it "or else" is completely unprofessional.

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Finally, if agreement is ever reached by all concerned on the installation and location of these monitoring wells, it will represent a change in scope in the workplan. Because of that, we will no doubt see a delay in the project schedule (in fact, the delay may be substantial) and SCD will likely incur significant additional costs due to this change in scope. I sincerely hope that you and your superiors at DNREC will take a stronger role in dealing with EPA regarding this project in the future to avoid such disruptions.

Sincerely,



Robert J. Touhey, P.E.
Assistant Vice President
Environmental Affairs

RJT/dab
Enclosure

cc: A. R. Sinibaldi
T. E. Pierson
A. Thomas
P. Retallick
G. Molchan

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